

December 27, 2001

David Bacon
Guardian Automotive Trim, Inc.
P.O. Box 5109
Evansville, Indiana 47716-5109

Re: 163-14005
First Administrative Amendment to
Part 70 163-6502-00017

Dear David Bacon:

Guardian Automotive Trim, Inc. was issued a Title V permit on January 19, 1999 for a stationary automotive decorative trim coating operation. A letter requesting a change was received on February 12, 2001. Pursuant to the provisions of 2-7-11(a)(7) and (8), the permit is hereby administratively amended as follows:

1) Condition B.13(b)(3) shall be amended as follows:

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit. **Reasonable steps to minimize the level of emissions may include, but are not limited to, actions to decrease the production output of the spray paint line or operation of the spray paint line as necessary to complete a production run initiated prior to the onset of the emergency;**

2) Condition B.13(b)(6) shall be amended as follows:

- (6) The Permittee immediately took all reasonable steps to correct the emergency. **Reasonable steps to correct the emergency may include, but are not limited to, immediate efforts to restart the regenerative thermal oxidizer, or immediate efforts to examine the regenerative thermal oxidizer and identify, to the extent possible, the cause of the emergency.**

3) Condition B.13(g)(1) shall be amended as follows:

- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions. **Reasonable steps to minimize**

the level of emissions may include, but are not limited to, actions to decrease the production output of the spray paint line or operation of the spray paint line as necessary to complete a production run initiated prior to the onset of the emergency. Reasonable steps to correct the emergency may include, but are not limited to, immediate efforts to restart the regenerative thermal oxidizer, or immediate efforts to examine the regenerative thermal oxidizer and identify, to the extent possible, the cause of the emergency.

4) Condition D.5.1(a) shall be amended as follows:

D.5.1 Volatile Organic Compound (VOC) Limit [326 IAC 2-2][326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the one (1) high gloss and low gloss robotic spray coating line, coating plastic parts, identified as H20 shall be:

- (a) The use at all times that the one (1) high gloss and low gloss robotic spray coating line is in operation of a regenerative thermal oxidizer that maintains a minimum overall VOC control efficiency (including capture and destruction efficiencies) of 90.0%. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1500 °F during operation until a temperature and ~~fan amperage~~ **fan speed in Hertz** has been determined from the most recent compliant stack test, as approved by IDEM.

5) Condition D.5.7 shall be amended as follows:

D.5.7 Regenerative Thermal Oxidizer

- (a) **In order to demonstrate compliance with D.5.1, the regenerative thermal oxidizer shall be operated at all times that the spray painting process is in operation, unless the regenerative thermal oxidizer cannot be operated due to an emergency as set forth in Condition B.13, Emergency Provisions.** ~~The regenerative thermal oxidizer shall operate at all times that the process is in operation.~~ When operating, the thermal incinerator shall maintain a minimum operating temperature of 1500 °F during operation until a temperature and ~~fan amperage~~ **fan speed in Hertz** has been determined from the most recent compliant stack test, as approved by IDEM. The temperature correlates to an overall VOC control efficiency of 90.0%.
- (b) **With respect to Conditions B.13(b)(3) and (g)(1), “reasonable steps to minimize the level of emissions” may include, but are not limited to, actions to decrease the production output of the spray paint line or operation of the spray paint line as necessary to complete a production run initiated prior to the onset of the emergency.**
- (c) **With respect to Conditions B.13(b)(6) and (g)(1), “reasonable steps to correct the emergency” may include, but are not limited to, immediate efforts to restart the regenerative thermal oxidizer, or immediate efforts to examine the regenerative thermal oxidizer and identify, to the extent**

possible, the cause of the emergency.

6) Condition D.5.8(b) shall be amended as follows:

- (b) The ~~duct pressure or fan amperage~~ **fan speed in Hertz** shall be observed at least once per week when the thermal oxidizer is in operation. This ~~pressure or amperage fan speed in Hertz~~ shall be maintained within the range, as established in most recent compliant stack test, to maintain a minimum 90.0% overall control efficiency (including capture and destruction efficiencies) of VOC emissions from the one (1) high gloss and low gloss robotic spray coating line.

7) Condition D.5.9(a)(7) shall be amended as follows:

- (7) Weekly records of the ~~duct pressure or fan amperage~~ **fan speed in Hertz**.

8) This is also the associated Administrative Amendment associated with Significant Source Modification 163-12662.

9) All references to OAM have been changed to OAQ.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Donald Poole, at (800) 451-6027, press 0 and ask for Donald Poole or extension (2-8327), or dial (317) 232-8327.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

drp

cc: File - Vanderburgh County
U.S. EPA, Region V
Vanderburgh County Health Department
Southwest Regional Office
Air Compliance Section Inspector - Scott Anslinger
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner
Office of Legal Counsel - Aaron Schmoll

PART 70 OPERATING PERMIT
Office of Air Quality
and
CITY OF EVANSVILLE EPA

Guardian Automotive Trim, Inc.
601 North Congress Avenue
Evansville, Indiana 47715

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T163-6502-00017	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: January 19, 1999
First Administrative Amendment: 163-11080	Issuance Date: July 26, 1999
Second Administrative Amendment: 163-11523	Issuance Date: November 29, 1999
First Significant Permit Modification No.:163-11558	Issuance Date: February 14, 2000
Third Administrative Amendment 163-11681	Issuance Date: February 15,2000
Fourth Administrative Amendment No.: 163-14005 Pages Amended:1-4, 11-13a, 40d-f,42a, and 42b	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 27, 2001

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONDITIONS

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)]
- B.13 Emergency Provisions [326 IAC 2-7-16]
- B.14 Permit Shield [326 IAC 2-7-15]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.18 Permit Renewal [326 IAC 2-7-4]
- B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.20 Permit Revision Under Economic Incentives and Other Programs
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.22 Operational Flexibility [326 IAC 2-7-20]
- B.23 Construction Permit Requirement [326 IAC 2]
- B.24 Inspection and Entry [326 IAC 2-7-6(2)]
- B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
- B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-7-6(1)]

- C.8 Performance Testing [326 IAC 3-6]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.9 Compliance Schedule [326 IAC 2-7-6(3)]
- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Monitoring Methods [326 IAC 3]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

- D.1 FACILITY OPERATION CONDITIONS - One (1) Department 23 high gloss robotic spray coating line (U23-1), one (1) Department 23 low gloss robotic spray coating line, (U23-2), One (1) Department 13 (formerly Department 14) air atomization hand spray coating booth (formerly 14-1B), three (3) Department 13 automatic paint machines, one (1) Department 13 hand spray coating line (U13-1), one (1) Department 13 air atomization hand spray coating booth (U13-2), one (1) Department 13 air atomization hand spray coating booth (U13-3), one (1) Department 13 air atomization hand spray coating booth (U13-4), one (1) Department 13 air atomization hand spray coating booth (U13-5), one (1) Department 13 air atomization hand spray coating booth (U13-6), one (1) Department 22 robotic spray coating line (U22R-1), one (1) Department 22 robotic spray coating line (U22R-2), one (1) Department 20 paint line (U20-1), one (1) Department 20 paint line (U20-2), one (1) Department 20 paint line (U20-3), one (1) Department 20 air atomization spray booth (U20-4), one (1) Department 22 robotic spray coating line (U22R-3), two (2) air atomization spray coating booths (formerly 20C-6B and 20C-7B), one (1) Department 15 air atomization spray coating booth (U15-1), one (1) Department 20 HVLP paint spray booth (20-12B), and two (2) Department 25 air atomization spray coating booths (25S-1B and 25S-4B)**

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.1.6 Volatile Organic Compounds (VOC)
- D.1.7 VOC Emissions
- D.1.8 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.9 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.10 Record Keeping Requirements
- D.1.11 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS -Two (2) decorative chrome electroplating operations

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]
- D.2.2 Chromium Electroplating NESHAP [326 IAC 20-8-1][40 CFR Part 63, Subpart N]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
- D.2.4 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]

Compliance Determination Requirements

- D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][40 CFR 63.344]
- D.2.6 Monitoring to Demonstrate Continuous Compliance [40 CFR 63.343(c)(5) & (7)]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.2.7 Record Keeping Requirements [40 CFR 63.346]
- D.2.8 Reporting Requirements [40 CFR 63.345 & 63.347]

D.3 FACILITY OPERATION CONDITIONS - Two (2) 8.728 mmBtu/hr natural gas fired boilers (Boiler #1 and Boiler #2)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2a.1 Particulate Matter for Indirect Heating (PM) [326 IAC 6-2]

Compliance Determination Requirements

- D.2a.2 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.2a.3 New Source Performance Standards (NSPS) 40 CFR § 60.48, Subpart Dc

D.3 FACILITY OPERATION CONDITIONS - Two (2) 7.0 mmBtu/hr natural gas fired boilers (Boiler #1 and Boiler #2)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.3.1 Particulate Matter (PM) [326 IAC 6-2-3]

Compliance Determination Requirements

- D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.3.3 Monitoring

D.4 FACILITY OPERATION CONDITIONS - One (1) Department 23 high gloss robotic spray coating booth (23-13B)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.4.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.4.6 Volatile Organic Compounds (VOC)
- D.4.7 VOC Emissions
- D.4.8 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.4.9 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.10 Record Keeping Requirements

D.4.11 Reporting Requirements

D.5 FACILITY OPERATION CONDITIONS - High gloss and low gloss robotic spray coating line (H20)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compound (VOC) Limit [326 IAC 2-2][326 IAC 8-1-6]

D.5.2 New Source Toxics Control [326 IAC 2-4.1-1]

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.5.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

D.5.5 Volatile Organic Compounds (VOC)

D.5.6 Regenerative Thermal Oxidizer

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.5.7 Parametric Monitoring

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.8 Record Keeping Requirements

Certification

Emergency/Deviation Occurrence Report

Quarterly Reports

Chromium Electroplating NESHAP Ongoing Compliance Status Report

Quarterly Compliance Monitoring Report

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and City of Evansville EPA. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary automotive decorative trim coating operation.

Responsible Official: David Bacon
Source Address: 601 North Congress Avenue, Evansville, Indiana 47715
Mailing Address: P.O. Box 5109, Evansville, Indiana 47716-5109
SIC Code: 3089
County Location: Vanderburgh
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary[326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) Department 23 high gloss robotic spray coating line, coating plastic parts, constructed in March, 1994, identified as U23-1, consisting of four (4) High Volume, Low Pressure (HVLP) spray booths (23-5B, 23-6B, 23-7B and 23-8B), each using water back booths for Particulate Matter (PM) control, each exhausting to one (1) stack (23-5B, 23-6B, 23-7B, and 23-8B);
- (2) One (1) Department 23 low gloss robotic spray coating line, coating plastic parts, constructed in March, 1994, identified as U23-2, consisting of four (4) High Volume, Low Pressure (HVLP) spray booths (23-9B, 23-10B, 23-11B and 23-12B), each using water back booths for Particulate Matter (PM) control, each exhausting to one (1) stack (23-9B, 23-10B, 23-11B, 23-12B and 23-1H);
- (3) One (1) Department 13 (formerly Department 14) air atomization hand spray coating booth, coating plastic parts, constructed before 1980, no identification number assigned (formerly 14-1B), using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (no identification number assigned (formerly 14-1B)) and three (3) Department 13 automatic paint machines, identified as 13-7, 13-8, and 13-9, coating plastic parts, constructed before 1980, using fabric filters for Particulate Matter (PM) control, each exhausting to one (1) stack (13-1A, 13-2A, and 13-3A);
- (4) One (1) Department 13 hand spray coating line, coating plastic parts, constructed before 1980, identified as U13-1, consisting of three (3) air atomization spray booths (13-7B, 13-8B and 13-9B), spray booth 13-7B using a water back booth for Particulate Matter (PM) control and spray booths 13-8B and 13-9B using fabric filters for Particulate Matter (PM) control, each exhausting to one (1) stack (13-7B, 13-8B and 13-9B);
- (5) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-2, using a water back booth for Particulate Matter (PM) control, exhausting to one (1) stack (13-6B);

- (6) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-3, using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (13-5B);
- (7) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-4, using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (13-3B);
- (8) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-5, using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (13-2B);
- (9) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-6, using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (13-1B);
- (10) One (1) Department 22 robotic spray coating line, coating plastic parts, constructed before 1980, identified as U22R-1, consisting of two (2) air atomization spray booths (22R-1B and 22R-2B), each using a water back booth for Particulate Matter (PM) control, each exhausting to one (1) stack (22R-1B and 22R-2B);
- (11) One (1) Department 22 robotic spray coating line, coating plastic parts, constructed before 1980, identified as U22R-2, consisting of two (2) air atomization spray booths (22R-3B and 22R-4B), each using a water back booth for Particulate Matter (PM) control, each exhausting to one (1) stack (22R-3B and 22R-4B);
- (12) One (1) Department 20 paint line, coating plastic parts, constructed before 1980, identified as U20-1, consisting of four (4) air atomization spray booths (20-1B, 20-2B, 20-3B and 20-4B), each using a water back booth for Particulate Matter (PM) control, each exhausting to one (1) stack (20-1B, 20-2B, 20-3B and 20-4B);
- (13) One (1) Department 20 paint line, coating plastic parts, constructed before 1980, identified as U20-2, consisting of two (2) air atomization spray booths (20-5B and 20-6B), each using a water back booth for Particulate Matter (PM) control, each exhausting to one (1) stack (20-5B and 20-6B);
- (14) One (1) Department 20 paint line, coating plastic parts, constructed before 1980, identified as U20-3, consisting of two (2) air atomization spray booths (20-7B and 20-8B), spray booth 20-7B using fabric filters for Particulate Matter (PM) control and spray booth 20-8B using a water back booth for Particulate Matter (PM) control, each exhausting to one (1) stack (20-7B and 20-8B);
- (15) One (1) Department 20 air atomization spray booth, coating plastic parts, constructed before 1980, identified as U20-4, using a water back booth for Particulate Matter (PM) control, exhausting to one (1) stack (20-9B);
- (16) One (1) Department 22 robotic spray coating line, coating plastic parts, constructed before 1980, identified as U22R-3, consisting of two (2) air atomization spray booths (22R-5B and 22R-6B), each using a water back booth for Particulate Matter (PM) control, each exhausting to one (1) stack (22R-5B and 22R-6B);
- (17) Two (2) air atomization spray coating booths, coating plastic parts, now located in storage, constructed before 1980, formerly identified as 20C-6B and 20C-7B, using a water back booth for Particulate Matter (PM) control;

- (18) One (1) Department 15 air atomization spray coating booth, coating plastic parts, constructed before 1980, identified as U15-1, using a fabric filter for Particulate Matter (PM) control, exhausting to one (1) stack (15-1B);
- (19)
 - (a) One (1) decorative chrome electroplating line, constructed in January 1991 and modified in March 1993, identified as U19-1, using wet scrubbers and fume suppressant for Particulate Matter (PM) and Hazardous Air Pollutant (HAP) control, exhausting to five (5) stacks (19-1S, 19-2S, 19-3S, 19-4S and 19-5);
 - (b) One (1) new decorative chrome electroplating line, using a wetting agent for Particulate Matter (PM) and chromic emissions control; and
 - (c) Seven (7) Vannaire's scrubbers, IDS1 through S7 which are voluntarily installed to control the water vapor from the plating line, that causes corrosion to process equipment and building roofs.
- (20) One (1) Department 20 High Volume, Low Pressure (HVLP) paint spray booth, coating plastic parts, constructed in 1997, identified as 20-12B, using a water wash booth for Particulate Matter (PM) control, exhausting to one (1) stack (20-12B); and
- (21) Two (2) Department 25 air atomization spray coating booths, coating plastic parts, constructed before 1980, identified as 25S-1B and 25S-4B, each using fabric filters for Particulate Matter (PM) control, each exhausting to one (1) stack (25S-1B and 25S-4B).
- (22) One (1) new natural gas-fired boiler, with a heat input rate not to exceed 19 million British Thermal Units per hour (mmBtu/hr); and
- (23) Five (5) new natural gas-fired air make-up units, with a total heat input rate not to exceed 36 mmBtu/hr.
- (24) One (1) high gloss and low gloss robotic spray coating line, coating plastic parts, identified as H20, consisting of four (4) High Volume, Low Pressure (HVLP) spray booths, each using water wash for Particulate Matter (PM) control, utilizing a regenerative thermal oxidizer as control and exhausting to stack RTOE. The regenerative thermal oxidizer has a heat input of 2 mmBtu per hour, a 90% overall collection efficiency, and exhausts to stack RTOE.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Two (2) natural gas fired boilers, identified as Boiler #1 and Boiler #2, each with maximum heat input capacity of 8.728 million British thermal units per hour (mmBtu/hr).
- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

schedule for said items or conditions;

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Evansville EPA
Room 250
101 N.W. Martin Luther King Jr. Blvd
Evansville, Indiana 47708

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, and City of Evansville EPA upon request and shall be subject to review and approval by IDEM, OAQ, and City of Evansville EPA.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit. Reasonable steps to minimize the level of emissions may include, but are not limited to, actions to decrease the production output of the spray paint line or operation of the spray paint line as necessary to complete a production run initiated prior to the onset of the emergency;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and City of Evansville EPA within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or

reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,
Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

City of Evansville EPA Telephone Number: 812-426-5597

City of Evansville EPA Facsimile Number: 812-426-7344

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Evansville EPA
Room 250
101 N.W. Martin Luther King Jr. Blvd
Evansville, Indiana 47708

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency. Reasonable steps to correct the emergency may include, but are not limited to, immediate efforts to restart the regenerative thermal oxidizer, or immediate efforts to examine the regenerative thermal oxidizer and identify, to the extent possible, the cause of the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and City of Evansville EPA may require that the Preventive Maintenance

Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ, and City of Evansville EPA by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions. Reasonable steps to minimize the level of emissions may include, but are not limited to, actions to decrease the production output of the spray paint line or operation of the spray paint line as necessary to complete a production run initiated prior to the onset of the emergency. Reasonable steps to correct the emergency may include, but are not limited to, immediate efforts to restart the regenerative thermal oxidizer, or immediate efforts to examine the regenerative thermal oxidizer and identify, to the extent possible, the cause of the emergency.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, and City of Evansville EPA shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (22) One (1) high gloss and low gloss robotic spray coating line, coating plastic parts, identified as H20, consisting of four (4) High Volume Low Pressure (HVLP) spray booths, each using water wash for Particulate Matter (PM) control, utilizing a regenerative thermal oxidizer as control and exhausting to stack RTOE. The regenerative thermal oxidizer has a heat input of 2 million British thermal units (mmBtu) per hour, and exhausts to stack RTOE.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compound (VOC) Limit [326 IAC 2-2][326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the one (1) high gloss and low gloss robotic spray coating line, coating plastic parts, identified as H20 shall be:

- (a) The use at all times that the one (1) high gloss and low gloss robotic spray coating line is in operation of a regenerative thermal oxidizer that maintains a minimum overall VOC control efficiency (including capture and destruction efficiencies) of 90.0%. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1500 °F during operation until a temperature and fan speed in Hertz has been determined from the most recent compliant stack test, as approved by IDEM.
- (b) The VOC content delivered to the spray coating line H20 shall be limited to less than 228.88 tons per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 22.89 tons per twelve (12) consecutive month period.

D.5.2 New Source Toxics Control [326 IAC 2-4.1-1]

- (a) HAP emissions from the one (1) high gloss and low gloss robotic spray coating line, shall be controlled by the regenerative thermal oxidizer, to assure the single HAP and total HAPs emissions are maintained at less than 10 and 25 tons, respectively, per 12 month consecutive period. This requirement will render the requirements of 326 IAC 2-4.1-1 not applicable.
- (b) The any single HAP content delivered to the spray coating line H20 shall be limited to less than 85.24 tons per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of any single HAP content to less than 8.52 tons per twelve (12) consecutive month period.
- (c) The total HAP content delivered to the spray coating line H20 shall be limited to less than 155.45 tons per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of total HAP content to less than 15.54 tons per twelve (12) consecutive month period.

D.5.3 PSD Minor Modification Limit [326 IAC 2-2] [40 CFR 52.21]

The controlled VOC potential emissions from this facility are less than 40 tons per year. Therefore, the PSD requirement in 326 IAC 2-2 (PSD) does not apply. Any change or modification which may increase VOC potential emissions to 40 tons per year or more from this facility shall obtain OAQ approval before such change may occur.

D.5.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.5.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 180 days after issuance of this permit, the Permittee shall perform VOC testing utilizing Methods 25 (40 CFR 60, Appendix A) for VOC or other methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.

D.5.6 Volatile Organic Compounds (VOC)

Compliance with the VOC and HAP content and usage limitations in order to demonstrate the compliance of Conditions D.5.1, D.5.2 and D.5.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.5.7 Regenerative Thermal Oxidizer

- (a) In order to demonstrate compliance with D.5.1, the regenerative thermal oxidizer shall be operated at all times that the spray painting process is in operation, unless the regenerative thermal oxidizer cannot be operated due to an emergency as set forth in Condition B.13, Emergency Provisions. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1500 °F during operation until a temperature and fan speed in Hertz has been determined from the most recent compliant stack test, as approved by IDEM. The temperature correlates to an overall VOC control efficiency of 90.0%.
- (b) With respect to Conditions B.13(b)(3) and (g)(1), "reasonable steps to minimize the level of emissions" may include, but are not limited to, actions to decrease the production output of the spray paint line or operation of the spray paint line as necessary to complete a production run initiated prior to the onset of the emergency.
- (c) With respect to Conditions B.13(b)(6) and (g)(1), "reasonable steps to correct the emergency" may include, but are not limited to, immediate efforts to restart the regenerative thermal oxidizer, or immediate efforts to examine the regenerative thermal oxidizer and identify, to the extent possible, the cause of the emergency.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.5.8 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) The fan speed in Hertz shall be observed at least once per week when the thermal oxidizer is in operation. This fan speed in Hertz shall be maintained within the range, as established in most recent compliant stack test, to maintain a minimum 90.0% overall control efficiency (including capture and destruction efficiencies) of VOC emissions from the one (1) high gloss and low gloss robotic spray coating line.

- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.5.1, D.5.2, D.5.3 and D.5.8, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits and/or the HAP emission limits established in Conditions D.5.1, D.5.2, D.5.3 and D.5.8.
- (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month;
 - (5) The weight of VOCs and HAPs emitted for each compliance period;
 - (6) The continuous temperature records for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test; and
 - (7) Weekly records of the fan speed in Hertz.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 and D.5.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Guardian Automotive Trim, Inc.
Source Address: 601 N. Congress Avenue, Evansville, IN 47715
Mailing Address: P.O. Box 5109, Evansville, Indiana 47716-5109
Part 70 Permit No.: T163-6502-00017
Facility: Spray coating line H20
Parameter: VOC Usage
Limit: The VOC content delivered to the spray coating line H20 shall be limited to less than 228.88 tons per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 22.89 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Guardian Automotive Trim, Inc.
Source Address: 601 N. Congress Avenue, Evansville, IN 47715
Mailing Address: P.O. Box 5109, Evansville, Indiana 47716-5109
Part 70 Permit No.: T163-6502-00017
Facility: Spray coating line H20
Parameter: Any single HAP/ Total HAP
Limit: (a) The any single HAP content delivered to the spray coating line H20 shall be limited to less than 85.24 tons per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of any single HAP content to less than 8.52 tons per twelve (12) consecutive month period.

(b) The total HAP content delivered to the spray coating line H20 shall be limited to less than 155.45 tons per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of total HAP content to less than 15.54 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 3	Column 4	Column 1 + Column 3	Column 2 + Column 4
	Any Single Hap Usage This Month	Total Hap Usage This Month	Any Single Hap Usage Previous 11 Months	Total Hap Usage Previous 11 Months	Any Single Hap Usage 12 Month Total	Total Hap Usage 12 Month Total
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Administrative Amendment to a Part 70 Operating Permit

Source Background and Description

Source Name:	Guardian Automotive Trim, Inc.
Source Location:	601 North Congress Avenue, Evansville, Indiana 47715
County:	Vanderburgh
SIC Code:	3089
Operation Permit No.:	T163-6502-00017
Operation Permit Issuance Date:	January 19, 1999
Administrative Amendment No.:	163-14005-00017
Permit Reviewer:	drpoole

The Office of Air Quality (OAQ) has reviewed an amendment application from Guardian Automotive Trim, Inc. relating to the settlement of a permit appeal.

Explanation of Modification

Issue #1) The BACT Requirement of 326 IAC 8-1-6 should not be applicable.

The RTO will reduce emissions by 90% to less than 22.89 tons VOC and 15.54 tons HAP per year. In comments filed on the proposed Permit Modification, Guardian argued that because emissions after controls would be less than 25 tons per year of VOCs, the BACT requirement of 326 IAC 8-1-6 was not applicable. IDEM responded by arguing that the applicability of 326 IAC 8-1-6 is determined before controls. As set forth below, we believe IDEM's interpretation of 326 IAC 8-1-6 is wrong.

326 IAC 8-1-6 states that "new facilities (as of January 1, 1980) which have potential emissions of 22.7 megagrams (25 tons) or more per year, located anywhere in the state, which are not otherwise regulated by other provisions of this article (326 IAC 8), shall reduce VOC emissions using best available control technology (BACT)."

While Indiana regulations define "potential emissions" as emissions before pollution controls (326 IAC 1-2-55), numerous other sections of the Indiana regulations define potential to emit as emissions after controls as long as the controls are required by an enforceable permit condition. For example, the "potential to emit" definition set forth in 326 IAC 2-1.1-1(16) and 326 IAC 2-7-1(29) is the "maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollutant control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Indeed, the forms that IDEM requires companies to use to perform a BACT analysis, including analysis under 326 IAC 8-1-6, refer to the "potential to emit" definition in 326 IAC 2-1.1-1(16). In

our case, the RTO and VOC permit limits of less than 25 tons per year, are contained in a Part 70 permit that is enforceable by U.S. EPA and IDEM. Therefore, those emission limits should be sufficient to render the requirements of 326 IAC 8-1-6 inapplicable.

Response to Issue #1

326 IAC 1-2-55 defines potential emissions as: "Emissions of any one (1) pollutant which would be emitted from a facility if that facility were operated without the use of pollution control equipment unless such control equipment is (aside from air pollution control requirements) necessary for the facility to produce its normal product or is integral to the normal operation of the facility. Potential emissions shall be based on maximum annual rated capacity unless hours of operation are limited by enforceable permit conditions. Potential emissions from a facility shall take into account the hours of operation per year and shall be calculated according to federal emission guidelines in AP-42 most recent edition - Compilation of Air Pollution Factors, or calculated based on stack test data or other equivalent data acceptable to the commissioner."

326 IAC 2-1.1-1(16) defines potential to emit as: "Potential to emit means the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operation design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency. The term does not alter or affect the use of potential to emit for any other purpose under the CAA, (or "capacity factor" as used in Title IV of the CAA) or the regulations promulgated thereunder.

Some of the rules depend upon the definition of "potential emissions". Some rules depend upon the definition of "potential to emit". One cannot substitute one definition for another definition. The wording of the rules is what is used to determine the interpretation. In this case, 326 IAC 8-1-6 is dependent upon "potential emissions". Therefore, in analyzing whether the facility applies to this rule or not, its potential emissions are examined. For the facility of concern, its potential emissions are greater than the 25 tons per year referenced in the rule. Therefore, the rule applies and this requires that the facility perform BACT. Again, in this case, the RTO is accepted as BACT. The permit and its conditions reflect this determination. The wording of the rule 326 IAC 8-1-6 does not even address the concept of potential to emit. Therefore, the definition of this term does not enter into the determination of whether the rule applies to this facility or not. The rule, based upon potential emissions, does apply and BACT is applied.

No changes are made to the permit based upon this discussion.

Issue #2) The Requirement to operate the RTO at all times the spray coating line is in operation is unnecessary.

The Permit Modification contains several stringent operating restrictions on the RTO and on the VOC and HAP content delivered to the new spray coating line to insure that emissions remain low. The RTO must operate at an overall control efficiency of 90%. The RTO must maintain a minimum temperature of 1500 degrees Fahrenheit until further restrictions can be set as a result of a stack test. VOC content delivered to the new spray coating line must be less than 228.88 tons per year, while HAP content must be less than 85.24 tons for a single HAP, and 155.45 for a combination of HAPs. Guardian does not contest these terms. The term that requires operation of the RTO at all times that the spray painting line is in operation is, however, unnecessary stringent, given all of the other restrictions set forth in the Permit Modification. Nor does IDEM cite any specific regulation that requires such a term in the Permit Modification.

Accordingly, we do not believe the term is required or wise. Guardian operates in a highly competitive atmosphere that relies on lean manufacturing principles to remain productive and profitable. We paint automotive parts of automotive manufacturers on an extremely demanding

schedule. There are severe penalties should we not be able to fill an order resulting in the shutdown of a client's production line.

If the RTO happens to breakdown on a particular day, we need the flexibility in our permit to continue with temporary production, notwithstanding outage of the RTO. We are convinced the overall efficiency rating of 90% can still be achieved through a diligent maintenance plan, along with an inventory of spare parts for the RTO, but are asking for flexibility in our permit for times when minimal bypassing is needed. We will still comply with all of the other terms of the Modified Permit, and are willing to consider alternative terms to satisfy whatever concerns IDEM may have about operation of the RTO.

Response to Issue #2

Condition D.5.7 shall be adjusted to meet some of these concerns.

Issue #3) Fan speed as expressed in Hertz should be substituted for fan amperage.

Sections D.5.1(a) and D.5.7 of the Permit Modification state in part that "when operating, the thermal incinerator shall maintain a minimum operating temperature of 1500 degrees F during operation until a temperature and fan amperage has been determined from the most recent compliant stack test, as approved by IDEM." Guardian has recently determined, based on recent testing at another facility, and the company's knowledge of the particular fan equipment, that fan speed expressed in terms of Hertz is a more efficient indicator than fan amperage. Guardian therefore requests that the permit term for "fan amperage" should be changed to "fan speed expressed in terms of Hertz."

Response to Issue #3

The term "duct pressure or fan amperage" shall be replaced by the term "fan speed in Hertz." Conditions D.5.1(a), D.5.7, D.5.8(b), and D.5.9(a)(7) shall be adjusted.

Issue #4) Amend Section B.13(g)(1) by adding the following language:

At all times this section [Section B.13, Emergency Provisions] shall supersede the requirement that the regenerative thermal oxidizer (RTO) operated at all times that the paint line process is in operation, as set forth in Sections D.5.1(a) and D.5.7.

Response to Issue #4

Condition D.5.7 will be amended to include language which clarifies the connection to the wording in Condition B.13.

Issue #5) We recommend clarifications to the requirements that Guardian, in order invoke the emergency defense, is required to: (1) take all reasonable steps to minimize the level of emissions during the emergency (see Section B.13(b)(3) and (g)(1); and (2) take all reasonable steps to correct the emergency (see Section B.13(b)(6) and (g)(1) as follows:

Regarding the "reasonable steps to minimize the level of emissions" language, amend or add the following language: During an emergency, reasonable steps to minimize the level of emissions may include (1) actions to decrease the overall production output of the spray paint line by operating only as necessary to complete immediate production needs, or (2) operation of the spray paint line only as necessary to complete a production run currently in progress, or a production run initiated prior to the onset of the emergency.

Regarding the "reasonable steps to correct the emergency" language, amend or add the following

language: The Permittee will take all reasonable steps to correct the emergency, including but not limited to (1) immediate efforts to examine and/or restart the regenerative thermal oxidizer (RTO), or (2) immediate efforts to initiate an examination of the RTO and identify, to the extent possible, the cause of the emergency.

Response to Issue #5

Conditions B.13(b)(3), (b)(6), and (g)(1) will be amended to add the language noted above.

Justification for the Amendment

The Part 70 Operating permit is being modified through a Part 70 Administrative Amendment. This amendment is being performed pursuant to 326 IAC 2-7-11(a)(7) and (8) where it "Makes a change to a monitoring, maintenance, or record keeping requirement established by this article that is not environmentally significant. Such change shall not be an administrative amendment if the monitoring, maintenance, or record keeping is required by an applicable requirement." and "Revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term."

Recommendation

The staff recommends to the Commissioner that the Administrative Amendment be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 12, 2001.

Conclusion

This administrative amendment shall be subject to the conditions of the attached Part 70 Permit No. 163-14005-00017.